

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff, 12 Civ. 6421 (KMK)**

**v.**

**EDWARD BRONSON, E-LIONHEART  
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL**

**Defendants**

**and**

**FAIRHILLS CAPITAL, INC.**

**Relief Defendant.**

**PLAINTIFF’S APPLICATION FOR A TEMPORARY RESTRAINING ORDER  
AND ASSET FREEZE TO PREVENT THE BRONSONS’ DISSIPATION OR  
LIQUIDATION OF ASSETS WITHOUT OVERSIGHT**

Pursuant to Fed. R. Civ. P. 65(b), plaintiff United States Securities and Exchange Commission (the “Commission”) seeks a temporary restraining order and asset freeze to prevent the Bronsons from dissipating or liquidating their assets including but not limited to the Cadillac Escalade without oversight.<sup>1</sup>

---

<sup>1</sup> The SEC would not object to a reasonable carve out for an alternative vehicle, upon appropriate proof of the reasonable cost of such vehicle. However, the SEC reserves the right to seek the repayment of any such carve out depending on the outcome of further discovery and accountings the SEC will request in connection with the pending contempt proceedings.

Dated: New York, New York  
December 30, 2022

s/ Maureen Peyton King  
Maureen Peyton King  
Senior Trial Counsel  
Securities and Exchange Commission  
New York Regional Office  
100 Pearl Street, Room 20-100  
New York, NY 10004  
Tel.: 212-336-0111  
E-mail: kingmp@sec.gov